

important not only to the maritime industry but in broader contexts as well. This Court should grant review to enforce *PEPCO*, restore the statutory meaning that Congress intended, and protect the legitimate interests of both workers and employers.

CONCLUSION

The petition for writ of certiorari should be granted.

Respectfully submitted,

RAYMOND H. WARNS, JR.

Counsel of Record

ROBERT J. BURKE, JR.

HOLMES WEDDLE & BARCOTT

999 Third Ave., Suite 2600

Seattle, WA 98104

(206) 292-8008

MICHAEL F. STURLEY

727 East Dean Keeton St.

Austin, TX 78705

(512) 232-1350